

FARLEY J. NEUMAN, ESQUIRE - State Bar #100021
TOM PROUNTZOS, ESQUIRE - State Bar #209409
JENKINS GOODMAN NEUMAN & HAMILTON LLP
417 Montgomery Street, 10th Floor
San Francisco, California 94104
Telephone: (415) 705-0400
Facsimile: (415) 705-0411

Attorneys for ROBERT J. NAGY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHARLES CATHCART, et al.,

Defendants.

Case No. C-07-4762-PJH

**NOTICE OF MOTION OF
DEFENDANT ROBERT J. NAGY TO
STAY THE PROCEEDINGS OR IN
THE ALTERNATIVE TO SEVER ALL
CLAIMS AND TRANSFER VENUE
PURSUANT TO 28 U.S.C. 1404(a)**

Date: September 10, 2008
Time: 9:00 a.m.
Dept.: Room 3, 17th Floor

Trial: March 23, 2009

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT ON September 10, 2008 at 9:00 a.m., or as soon
thereafter as the matter may be heard by the Court, Defendant ROBERT J. NAGY will
move the Court to stay the proceedings to preserve his Seventh Amendment right to a jury
trial or, in the alternative, to sever all claims against him and transfer venue pursuant to 28

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NOTICE OF MOTION AND MOTION OF DEFENDANT ROBERT J. NAGY TO STAY THE
PROCEEDINGS OR IN THE ALTERNATIVE TO SEVER ALL CLAIMS AND
TRANSFER VENUE PURSUANT TO 28 U.S.C. 1404(a)

1 U.S.C. 1404(a) to the District of South Carolina, Charleston Division.

2 This Motion is based on this Notice of Motion, the Memorandum of Points and
3 Authorities and the Declaration of Tom Prountzos filed and served herewith, as well as the
4 papers, records, and pleadings on file herein.

5 DATED: July 30, 2008

JENKINS GOODMAN NEUMAN
& HAMILTON LLP

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7 By: 

8 TOM PROUNTZOS
9 Attorneys for ROBERT J. NAGY
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